

Therese M. Shanks, Esq. (SBN 12890)  
Wade Beavers, Esq. (SBN 13451)  
Chelsie Adams, Esq. (SBN 13058)  
FENNEMORE CRAIG, P.C.  
7800 Rancharrah Parkway  
Reno, Nevada 89511  
Tel: 775-788-2228 Fax: 775-788-2229  
[tshanks@fennemorelaw.com](mailto:tshanks@fennemorelaw.com); [wbeavers@fennemorelaw.com](mailto:wbeavers@fennemorelaw.com);  
[cadams@fennemorelaw.com](mailto:cadams@fennemorelaw.com)

Andrew K. Stutzman, Esq. (PA Bar No. 72922)  
Stradley Ronon Stevens & Young, LLP  
2005 Market Street, Ste. 2600  
Philadelphia, PA 19103-7018  
Tel: 215-564-8728 Fax: 215-564-8210  
[AStutzman@stradley.com](mailto:AStutzman@stradley.com)  
*Pro Hac Vice*

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC., a  
Wyoming corporation,

Plaintiffs,

vs.

MICHAEL BEYS; RICHARD DE SILVA;  
and FTE NETWORKS, INC., a Nevada  
corporation

Defendants.

CASE NO.: **2:22-cv-01362-CDS-VCF**

**STIPULATION AND [PROPOSED] ORDER  
FOR EXTENSION OF TIME TO ANSWER  
VERIFIED AMENDED COMPLAINT**

**(First Request)**

**STIPULATION AND ~~[PROPOSED]~~ ORDER FOR EXTENSION OF TIME TO ANSWER  
VERIFIED AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiff Innovativ Media Group, Inc. and Defendants Michael Beys and Richard de Silva, (“Beys and de Silva”) stipulate through their undersigned counsel that Beys and de Silva’s deadline to file a response to Plaintiffs’ Verified Complaint be extended to October 14, 2022. Plaintiffs consent to the extension.

////

////

1 It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice  
2 any claims or defenses of any party to this action.

3 DATED this 14<sup>th</sup> day of September, 2022.

4 FENNEMORE CRAIG, P.C.

LEX DOMUS LAW

5 By: /s/ Therese M. Shanks  
6 Therese M. Shanks, Esq. (SBN 12890)  
7 Wade Beavers, Esq. (SBN 13451)  
8 Chelsie Adams, Esq. (SBN 13058)  
7800 Rancharrah Parkway  
Reno, Nevada 89511

By: /s/ Daniel S. Cereghino  
Daniel S. Cereghino, Esq. (SBN 11534)  
Brandi M. Planet, Esq. (SBN 11710)  
Austin M. Maul, Esq. (SBN 15596)  
1712 Tesara Vista Place  
Las Vegas, Nevada 89128

9 -AND-

*Attorneys for Defendants Beys and de Silva*

10 Andrew K. Stutzman, Esq. (PA Bar No.  
11 72922)  
12 Stradley Ronon Stevens & Young, LLP  
2005 Market Street, Ste. 2600  
Philadelphia, PA 19103-7018  
13 Tel: 215-564-8728 Fax: 215-564-8210  
14 [AStutzman@stradley.com](mailto:AStutzman@stradley.com)  
*Pro Hac Vice*

15 *Attorneys for Plaintiff*

IT IS SO ORDERED.



Cam Ferenbach  
United States Magistrate Judge

DATED 9-19-2022